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AO 91 (Rev. 11/11) Criminal Complaint

Special Agent: John Horwath

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Tanae Alexander

Case: 2:20-mj-30062
Assigned To : Unassigned
Assign. Date : 2/10/2020
Description: SEALED MATTER (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2017 through July 2018 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1341

Mail Fraud

18 U.S.C. § 1343

Wire Fraud

18 U.S.C. § 1349

Conspiracy to Commit Mail and Wire Fraud

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

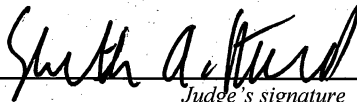
Date:

2-10-2020City and state: Detroit, MI


Complainant's signature

Special Agent John Horwath

Printed name and title



Judge's signature

Elizabeth A. Stafford

ELIZABETH A. STAFFORD

UNITED STATES MAGISTRATE JUDGE
Printed name and title

Affidavit of FBI Special Agent John Horwath

I, Special Agent John Horwath, hereafter referred to as AFFIANT, being duly sworn on oath, state as follows;

1. AFFIANT has been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since March of 2018. During my career with the FBI, I have directly participated in investigations involving complex financial crimes including wire and mail fraud, identity fraud, credit card fraud, and other federal violations. I am currently assigned to the Detroit Field Office, where I am a member of the complex financial crimes squad. Through my training and experience with the FBI, I have become familiar with the methods and techniques associated with various criminal schemes. I am familiar with and have used the following investigative techniques which have been relevant to this investigation: interviewing cooperating witnesses; analyzing financial and business records; conducting physical and electronic surveillance; and preparing and executing search warrants.
2. The information contained within this affidavit is based on my training and experience, business records obtained during this investigation, and information relayed to me by other law enforcement officers.

PURPOSE OF AFFIDAVIT

3. This affidavit is made in support of a criminal complaint alleging violations of 18 U.S.C. § 1341, Mail Fraud; 18 U.S.C. § 1343, Wire Fraud; and 18 U.S.C. § 1349, Conspiracy to Commit Mail and Wire Fraud, by TANAE ALEXANDER. It does not set forth all facts known to me in this investigation.

BACKGROUND OF ASURION

4. Asurion is a cellular device insurance company that replaces damaged or broken cellular devices. Asurion accepts claims via telephone or through its website. Asurion

processes all claims through its claims management system server located in Nashville, TN. According to Asurion, the claimant pays a deductible then provides a tracking number through the U.S. Postal Service, Federal Express (FEDEX), or United Parcel Service (UPS) indicating the claimant has shipped the broken or damaged device back to Asurion. Using this information Asurion sends a new device to the claimant via UPS or FedEx. Asurion can determine a claim to be fraudulent when either no package is received from the claimant or the claimant sends a shipment containing materials other than a broken or damaged device. In many such cases, Asurion has shipped multiple replacement phones as a result of an initial fraudulent claim if the claimant reports a replacement phone is damaged or non-operational.

BACKGROUND OF INVESTIGATION

5. In August of 2018, AFFIANT began an investigation related to claims Asurion determined to be fraudulent. Using information from Asurion, investigators learned that the phone numbers 586-XXX-XX52 and 586-XXX-XX66 were used in association with fraudulent claims. As described below, the phone numbers 586-XXX-XX52 and 586-XXX-XX66 are associated with ALEXANDER.

PHONE NUMBER 586-XXX-XX52

6. AT&T records show that ALEXANDER was the subscriber of phone number 586-XXX-XX52 from December 19, 2016 through August 22, 2018. ALEXANDER provided tanae.al@aol.com as her home email address.
7. Enterprise Rent-a-Car records show that ALEXANDER rented a vehicle on June 15, 2018 and provided 586-XXX-XX52 as her telephone number.
8. Lyft records show that user "Tanae Rich," who provided phone number 586-XXX-XX52 and email address tanae.al@aol.com, used Lyft in Miami, Florida on April 14, 2017 for two rides. The credit card 4941608XXXXX0051 was used to pay for the two rides.

CLAIMS RELATED TO 586-XXX-XX52

9. According to the information provided by Asurion, at least 10 fraudulent claims were filed between January 21, 2017 and March 20, 2018, with call activity from phone number 586-XXX-XX52. Some of the claims associated with phone number 586-XXX-XX52 are detailed below:

- a. On or about January 19, 2017, fraudulent claim 429217207 was submitted via the internet by an individual using a name with the initials S.J. claiming his or her device was damaged "doing my dai." The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship two replacement phones via FEDEX. The subscriber address was given as 10XXX Woodlawn St. Detroit, MI. The shipping address was given as 19XXX Goddard St., Detroit, MI.
- b. On or about January 26, 2017, fraudulent claim 429326436 was submitted via the internet by an individual using a name with the initials E.D. claiming his or her device was damaged "playing hop." The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship two replacement phones via FEDEX. The subscriber address was given as 15XXX Santa Rosa Dr. Detroit, MI. The shipping address was given as 44X Marston St., Detroit, MI.
- c. On or about March 29, 2017, fraudulent claim 430406597 was submitted via the internet by an individual using a name with the initials L.C. claiming his or her device was damaged "rushing back." The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship one replacement phone via FEDEX. The subscriber address was given as 83X McKinley Ave., Akron, OH. The shipping address was given as 22X E. Philadelphia St., Detroit, MI. The deductible fee for the claim was paid with credit card 4941608XXXXX0051.
- d. On or about March 20, 2018, fraudulent claim 437544715 was submitted via the internet by an individual using a name with the initials L.P. claiming he or she lost his or her device while he or she "Was on city bus phone fell out of jacket

pocket.” The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship one replacement phone via UPS. The subscriber address was given as 31XX Bickleigh Circle, Akron, OH. The shipping address was given as 19XXX Dean St., Detroit, MI. The claimant used the email address Lisa.pat66@yahoo.com.

- e. On or about July 20, 2018, fraudulent claim 58890348 was submitted via the internet by ALEXANDER claiming mechanical failure on her device that was connected to phone number 586-XXX-XX52. Her claim noted: “Not able to hear when making or receiving calls/FaceTime. phone will ring & whoever I’m calling their phone will ring , but can’t hear. Speaker button is blacked out. And voicemail automatically deactivated. Everything else works. Screen been cracked.” The claim was sent to an Asurion server in Nashville, TN. ALEXANDER sent Asurion an image of her Michigan driver license and a signed affidavit. The claim caused Asurion to ship two replacement phones via FEDEX. The subscriber address was given as 53XXX Celtic Dr., Shelby Township, MI. The shipping addresses were given as 53XXX Celtic Dr., Shelby Township, MI and 12XXX Heritage N., Warren, MI. ALEXANDER used the email address tanae.al@aol.com to file the claim.

PHONE NUMBER 586-XXX-XX66

10. AT&T records show that ALEXANDER was the subscriber of phone number 586-XXX-XX66 from April 7, 2018 through August 22, 2018. She provided tanae.al@aol.com as her home email address.

CLAIMS RELATED TO 586-XXX-XX66


11. According to the information provided by Asurion, at least 18 fraudulent claims were filed between April 28, 2018 and June 7, 2018, with call activity from phone number 586-

XXX-XX66. Two of the claims associated with phone number 586-XXX-XX66 are detailed below:

- a. On or about May 7, 2018, fraudulent claim 104308322108 was submitted via the internet by an individual using a name with the initials G.H. claiming his or her device was damaged because the "Phone fell off desk at work." The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship two replacement phones via UPS. The subscriber address was given as 17XXX Goddard St., Detroit, MI. The shipping address was also given as 17XXX Goddard St., Detroit, MI. The claimant used the email address Lisa.pat66@yahoo.com.
- b. On or about June 7, 2018, fraudulent claim 104711655919 was submitted via the internet by an individual using a name with the initials J.S. claiming his or her device was damaged because the "Phone fell down steps." The claim was sent to an Asurion server in Nashville, TN. The claim caused Asurion to ship one replacement phone via UPS. The subscriber address was given as 82XX Timken Ave., Warren, MI. The shipping address was also given as 82XX Timken Ave., Warren, MI.

CONCLUSION

12. Based on the aforementioned factual information, AFFIANT respectfully submits that there is probable cause to believe that TANAE ALEXANDER has committed mail fraud, wire fraud, and conspiracy in violation of 18 U.S.C §§ 1341, 1343, and 1349.
13. AFFIANT respectfully requests that a warrant be issued authorizing the arrest of TANAE ALEXANDER.



John Horwath

Subscribed and sworn before me
on 2-10-, 2020.



ELIZABETH STAFFORD
UNITED STATES MAGISTRATE JUDGE